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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

IVAN ZARICH,

Defendant.

No. CR 16-00358 MMC

**STIPULATION TO CONTINUE HEARING AND
[PROPOSED] ORDER**

STIPULATION TO CONTINUE HEARING

The United States of America, by and through Assistant United States Attorney Jerome Mayer-Cantú, as well as defendant Ivan Zarich, by and through defense counsel Richard Tamor, hereby stipulate that, with the Court's approval, the appearance currently scheduled for November 16, 2016, should be continued to November 30, 2016, and that the time between November 16, 2016 and November 30, 2016 should be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), for effective preparation of counsel.

The parties are working on a proposed resolution of this case, and the parties believe that two additional weeks will provide enough time to hammer out an agreement on all of the remaining details. The parties stipulate that the failure to grant the requested continuance would deny counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence under 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate that the requested continuance and further exclusion of time, from November 16, 2016 and November 30, 2016, are in the interests of justice and outweigh the best interest of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

IT IS SO STIPULATED.

Dated: November 15, 2016.

Respectfully submitted,

Richard Tamor

RICHARD TAMOR
Attorney for IVAN ZARICH

Jerome Mayer-Cantú

JEROME MAYER-CANTÚ
Assistant United States Attorney

IT IS SO ORDERED.

Dated: November 15, 2016.

Maxine M. Chesney
HON. MAXINE M. CHESNEY
United States District Judge